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Before the  
Federal Communications Commission  
Washington, D.C. 20554

FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY

92-100

In the Matter of )

Amendment of the Commission's )  
Rules to Establish New Personal )  
Communications Services )

GEN Docket No. ~~90-334~~  
ET Docket No. 92-100

To: The Commission

**COMMENTS ON WINFORUM REQUEST TO EXTEND REPLY COMMENTS  
DEADLINE**

The Unlicensed PCS Ad Hoc Committee for 2 GHz Microwave Transition and Management ("UTAM") hereby submits its comments on the request<sup>1</sup> of the Wireless Information Networks Forum ("WINForum") to extend the date for filing reply comments in the above-captioned dockets to July 20, 1993. WINForum's request references its Spectrum Etiquette and UTAM's Report and Recommendations and appears to seek an extension of the current date for replying to comments on both documents. As set out below, UTAM requests clarification that any relief granted pursuant to that request will likewise apply to both.

On May 18, 1993, the FCC established a schedule for comments and replies on WINForum's Spectrum Etiquette and UTAM's Report and Recommendations.<sup>2</sup> Comments were filed

<sup>1</sup> See WinForum Request to Extend Reply Comments Deadline, GEN Docket No. 90-314; ET Docket No. 92-100 (filed June 23, 1993).

<sup>2</sup> Public Notice, DA 93-577 (released May 18, 1993).

June 21, 1993, and replies are now due on July 6, 1993. Although UTAM does not require additional time beyond the presently imposed July 6, 1993 deadline to prepare and file a response to the numerous submissions addressing its Report and Recommendations, UTAM does not object to WINForum's request for an extension of the reply comment deadline to July 20, 1993. However, in view of the close linkage between the Etiquette and UTAM's proposals, UTAM submits that the date for reply comments on those two documents should remain consistent.

WINForum's Spectrum Etiquette seeks to resolve interference concerns between and among unlicensed PCS devices. UTAM's Report and Recommendations proposes mechanisms to protect 2 GHz microwave licensees from interference by unlicensed PCS devices. Both of these problems must be addressed before unlicensed PCS can be deployed. Severing the comment periods or the resolution of these related issues will serve no useful purpose and may exacerbate the existing burdens on limited agency and private resources.

According, if the Commission extends the deadline for filing reply comments on WINForum's Spectrum Etiquette, UTAM respectfully requests confirmation that such extension also applies to the filing date for replies to UTAM's Report and Recommendations.

Respectfully submitted,

UNLICENSED PCS AD HOC  
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MICROWAVE TRANSITION AND  
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June 28, 1993

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